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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CITY OF LAS VEGAS, a municipal corporation,
and CITY OF NORTH LAS VEGAS, a municipal
corporation,

Plaintiffs,

V.

BUREAU OF LAND MANAGEMENT, a federal agency; NEIL KORNZE, Director, Bureau of Land Management; LAS VEGAS FIELD OFFICE, Bureau of Land Management; and GAYLE MARRS-SMITH, Field Manager, Las Vegas Field Office.

Defendants.

No. 2:14-CV-1566-JAD-VCF

**JOINT STATUS REPORT AND
STIPULATION REQUESTING
EXTENSION OF STAY**

(EXPEDITED ACTION REQUESTED)

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INTRODUCTION

Defendants the United States Bureau of Land Management ("BLM"); Neil Kornze, Director of BLM; the Las Vegas Field Office, BLM; and Gayle Marrs-Smith, Field Manager, Las Vegas Field Office (collectively, "Defendants") and Plaintiffs the City of Las Vegas and the City of North Las Vegas (collectively, "Plaintiffs"), by and through counsel, stipulate to and respectfully request an order extending the current stay the proceedings for approximately ninety days, until **June 12, 2015**, at which time the Parties shall make a joint status report to the Court. All parties to this matter join this stipulation.

GROUNDS FOR STAY

In the stipulation filed by Plaintiffs and Defendants (jointly, the “Parties”) on December 19, 2014, the Parties reported their understanding that the National Defense Authorization Act for Fiscal Year 2015 (“NDAA FY2015”), which at the time had been passed by the U.S. Senate and House of Representatives but not signed by the President, contained provisions relating to the creation of the “Tule Springs Fossil Beds National Monument” in the Upper Las Vegas Wash (the “Tule Springs Monument”). The Tule Springs Monument affects lands at issue in this litigation. The parties requested a stay of the litigation so that they could consider the effect of the Tule Springs Monument, and so that they could vacate two deadlines”

- Reply in support of Defendants' Motion to Dismiss is due December 22, 2014 (per entry, Docket No. 14)
 - Discovery Plan/Scheduling Order is due January 8, 2015 (per entry, Docket No. 11)

On December 22, 2014, this Court granted the stipulated request and stayed the litigation until March 20, 2015.

JOINT STATUS REPORT

In the stipulation, the Parties represented that they would file a joint status report on March 20, 2015.

1 Since the stay went into effect, the proposed legislation has been signed by the President, and
2 the Tule Springs Monument has been created. The Parties have identified other provisions of the
3 legislation that affect this litigation.

4 The Parties have met in person and had preliminary discussions about settlement. The
5 Parties are in the process of organizing a face-to-face settlement meeting, a process that is taking
6 some time because of all the parties involved. Nevertheless, the Parties expect to be able to meet
7 and have substantive settlement discussions before June 12, 2015.

8 The stay currently in place has promoted settlement by allowing the Parties to focus on
9 resolution of the issues rather than on the details of litigation. Extending the stay will promote
10 settlement by allowing the Parties to continue to devote their energies away from the current
11 conflict, and towards a resolution of the Parties' differences. A stay will preserve the Parties'
12 resources and may well preserve judicial resources by avoiding filings that may be unnecessary.

13 DATED this 20th day of March 2015.

14 /s/ William E. Gerard
15 Trial Attorney
16 Department of Justice
17 Environment & Natural Resources Division
18 P. O. Box 7611
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20 Attorney for Defendants

21 /s/ Lawrence S. Bazel
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26 **IT IS SO ORDERED.**

27 
UNITED STATES MAGISTRATE JUDGE
28 **DATED:** March 20, 2015